

1 Richard W. Osman, State Bar No. 167993
2 Sheila D. Crawford, State Bar No. 278292
3 BERTRAND, FOX, ELLIOT, OSMAN &
4 WENZEL
5 2749 Hyde Street
6 San Francisco, California 94109
7 Telephone: (415) 353-0999
8 Facsimile: (415) 353-0990
9 Email: rosman@bfesf.com
scrawford@bfesf.com

10
11 Attorneys for Defendants
12 CITY OF VACAVILLE, JULIE BAILEY,
13 CHUCK BAILEY, DUSTIN WILLIS,
14 and DAVE SPENCER

15 Fulvio F. Cajina, State Bar No. 289126
16 LAW OFFICE OF FULVIO F. CAJINA
17 528 Grand Avenue
18 Oakland, CA 94610
19 Telephone: (415) 601-0779
20 Facsimile: (510) 225-2636
21 Email: fulvio@cajinalaw.com

22 Stanley Goff, State Bar No. 289564
23 LAW OFFICE OF STANLEY GOFF
24 15 Boardman Place Suite 2
25 San Francisco, CA 94103
26 Telephone: (415) 571-9570
27 Email: scraiggoft@aol.com

28 Attorneys for Plaintiffs
CARMEL GARCIA, M.Y. AND L.Y., minors by
and through their guardian ad litem VANESSA
RUIZ; L.Y., a minor by and through his guardian
ad litem FRANCISCA URIOSTEGUI

13
14 UNITED STATES DISTRICT COURT
15
16 EASTERN DISTRICT OF CALIFORNIA

17 CARMEL GARCIA, an individual; M.Y. AND
18 L.Y., minors by and through their guardian ad
litem VANESSA RUIZ; L.Y., a minor by and
through his guardian ad litem FRANCISCA
URIOSTEGUI,

19 Plaintiff,

20 v.

21 YUBA COUNTY SHERIFF'S
22 DEPARTMENT; YUBA COUNTY
23 SHERIFF'S DEPUTIES DOES 1-5; CITY OF
24 VACAVILLE; and VACAVILLE POLICE
OFFICER DOES 6-10;

25 Defendants.

26 Case No. 2:19-cv-02621-KJM-DB

27
28 **NINTH STIPULATED REQUEST TO
CONTINUE PRE-TRIAL DEADLINES; ORDER**

Judge: Kimberly J. Mueller

1 WHEREAS, Plaintiffs CARMEL GARCIA, M.Y. AND L.Y., minors by and through their
2 guardian ad litem VANESSA RUIZ; L.Y., a minor by and through his guardian ad litem FRANCISCA
3 URIOSTEGUI, (“Plaintiffs”) initiated this case on March 11, 2020 (Dkt. No. 1.1);

4 WHEREAS, Plaintiffs named the CITY OF VACAVILLE, JULIE BAILEY, CHUCK BAILEY,
5 DUSTIN WILLIS, and DAVE SPENCER as Defendants (collectively, “Defendants”);

6 WHEREAS, on October 14, 2022, the Court issued an order granting the Parties’ eighth
7 stipulation to continue pretrial deadlines (Dkt. No. 78);

8 WHEREAS, Defendants filed a motion for summary judgment (Dkt. No. 68), which was heard on
9 December 9, 2022;

10 WHEREAS, the Parties attended a settlement conference with Magistrate Judge Carolyn Delaney
11 on October 31, 2022, but the matter did not settle;

12 WHEREAS, the Parties wish to attend a second settlement conference after an Order on the
13 motion for summary judgment is issued and wish to avoid incurring additional expenses associated with
14 expert discovery before attending the second settlement conference;

15 WHEREAS, this stipulation is not made for any improper purpose and will not prejudice any
16 Party; and

17 WHEREAS, the requested modifications will not otherwise impact the trial date for the case as
18 none has been set.

19 **STIPULATION**

20 NOW, THEREFORE, Plaintiffs and Defendants stipulate and request the court continue presently
21 set pre-trial dates as follows:

Event	Current Deadline	Proposed Deadline
Expert Disclosures	January 20, 2023	March 20, 2023
Supplemental Experts	February 3, 2023	April 3, 2023
Completion of Expert Discovery	March 3, 2023	May 5, 2023

22 Dated: December 20, 2022

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

23 By: /s/ Richard W. Osman
Richard W. Osman
Sheila D. Crawford

Attorney for Defendants
CITY OF VACAVILLE, JULIE BAILEY,
CHUCK BAILEY, DUSTIN WILLIS, and DAVE
SPENCER

Dated: December 20, 2022

LAW OFFICES OF FULVIO F. CAJINA

By: /s/ Fulvio Cajina
Fulvio F. Cajina
Attorney for Plaintiffs
CARMEL GARCIA, M.Y. AND L.Y., minors by and
through their guardian ad litem VANESSA RUIZ;
L.Y., a minor by and through his guardian ad litem
FRANCISCA URIOSTEGUI

ELECTRONIC CASE FILING ATTESTATION

I, Richard W. Osman, hereby attest that I have on file all holograph signatures for any signatures indicated by a conformed signature ("s") within this E-filed document or have been authorized by counsel to show their signature on this document as /s/.

Dated: December 20, 2022

By: /s/ Richard W. Osman
Richard W. Osman

ORDER

PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO

ORDERED:

The pre-trial deadlines are continued as follows:

Event	Current Deadline	Proposed Deadline
Expert Disclosures	January 20, 2023	March 20, 2023
Supplemental Experts	February 3, 2023	April 3, 2023
Completion of Expert Discovery	March 3, 2023	May 5, 2023

DATED: December 23, 2022.

CHIEF UNITED STATES DISTRICT JUDGE